

Pacific International, Ltd.

CASE DIRECTION CENTER © 2006 555 Birch Street / Nekoosa, Wisconsin 54457-1397 / Toll Free (800) 477-2233 United States and Canada

PETITION FOR EXEMPTION

April 5, 2007

Office of the Secretary Federal Communications Commission Attention: CGB Room 3 – B431 445 – 12th Street SW Washington, DC 20554

Re:

Pacific International, Ltd.

To Whom It May Concern:

We are filing this correspondence with the Federal Communications Commission ("FCC") for the purpose of obtaining an exemption from the Closed Captioning Requirements set forth in regulations promulgated by the FCC.

Specifically, we believe that we fall within the undue burden exemption. Please consider this correspondence our Petition to obtain such an exemption.

In the case of Pacific International, Ltd. ("Pacific"), we advertise on television to obtain responses from individuals who seek to correct their children's condition of nocturnal enuresis – nighttime bedwetting. Our advertisements last for approximately 28 minutes. It would be an undue burden for Pacific to rework their advertisements to include closed captions. Pacific operates on a limited budget and it would be significantly difficult and expensive to convert to a closed caption situation. It would, in effect, prohibit Pacific from featuring these infomercials.

We enclose an Affidavit signed by the President of Pacific which is in support of the fact that Pacific qualifies for the undue burden exemption.

We ask that you process this Petition and issue an Order to the effect that Pacific need not comply with the closed captioned requirements due to the exemption for undue burden.

Please contact us if you desire any further information.

Thank you very much.

Very truly yours,
Eugene & Dragen

Eugene B. Draper

President



STATE OF WISCONSIN	۷)
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COUNTY OF WOOD)



Eugene B. Draper, being first duly sworn states as follows:

- 1. He is owner and President of Pacific International, Ltd. of Nekoosa, WI.
- 2. Pacific International, Ltd. engages in the sale of programs that correct nocturnal enuresis (nighttime bedwetting).
- 3. Pacific International, Ltd. features or desires to feature various infomercials on a number of television stations throughout the United States that encourage people to make inquiry to Pacific International, Ltd. if their family has a child or adult that suffers from this malady.
- 4. Pacific International, Ltd. has recently become aware of certain closed captioning requirements of the Federal Communications Commission. After a review of those requirements, the undersigned and Pacific International, Ltd. have concluded that Pacific International, Ltd. qualifies for an exemption from the closed captioning requirements of the FCC. Specifically, Pacific International believes that it falls within the undue burden exemption.
- 5. The reason that it presents an undue burden to Pacific International, Ltd. is that Pacific International, Ltd. is on a very limited budget. Compliance with the closed captioning requirements of the FCC would be overly difficult and expensive. For example, it would cost thousands of dollars for Pacific International, Ltd. to prepare new infomercials with closed captioning, an expense for which Pacific International, Ltd. is not able to pay.
- 6. Pacific International, Ltd. is on a very tight budget and has encountered various reverses in its business, preventing it from being able to meet such an obligation.

Dated this 5^{+h} day of April, 2007.

Eugené B. Draper

Personally came before me this day of April, 2007.

Brenda Marcouex

Notary Public, Wood County, WI My commission expires 1-30-11.

Notary Public
State of Wisconsin